



Oct 8 2009
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EXHIBIT 15

April 19, 1985

APR 23 1985

TO: Mr. J. H. M. Mixer

FROM: B. J. Mickelson *B. J. Mickelson*

SUBJECT: Introduction of Methyl Tertiary Butyl Ether (MTBE) in the Texas Eastern Transmission, Jacksonville, Florida; Charleston, South Carolina; and Wilmington, North Carolina Areas

As stated in previous memos dated February 22, 1985, and August 23, 1984, (attached) the inclusion of MTBE in Exxon gasoline is of concern as an incremental environmental risk for four reasons.

- MTBE has a much higher aqueous solubility than other soluble gasoline components, such as Benzene;
- MTBE has a lower taste and odor threshold than other soluble gasoline components;
- MTBE has a higher differential transport rate than other soluble gasoline components;
- MTBE unlike Benzene, Toluene and Xylene cannot be removed from solution to below detectable levels by carbon adsorption and must be treated by more complicated and expensive air stripping columns.

As a result we recommend that from an environmental risk point of view MTBE not be considered as an additive to Exxon gasolines on a blanket basis throughout the United States.

However, on an area-by-area basis the risks to the environment differ. As stated previously, in the Texas Pipeline system, we have experienced no known drinking water contamination incidents. This favorable incident record is a result of geohydrologic factors such as depth to potable aquifers, overlying confining layers, and cultural factors such as public utility districts supplying drinking water limiting the number of wells which could be impacted by a spill. Therefore, we saw no overriding reason to and did not recommend against the addition of MTBE in the Texas Pipeline system.

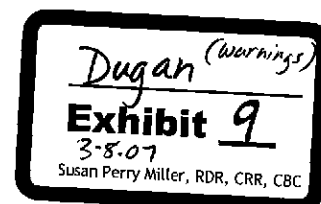
The mitigating factors which reduce the risks associated with the addition of MTBE in the Texas Pipeline System do not exist in other areas of the country where we market. From an environmental risk point of view we recommend against introducing MTBE into the Texas Eastern Transmission system and the South East Atlantic Coast.

As we have previously discussed we cannot estimate incremental cost associated with the introduction of MTBE without a contamination impact study on the proposed markets for possible MTBE usage. Real Estate and Engineering, Environmental Engineering does not have sufficient technical manpower in-house to complete a nationwide risk assessment by year-end 1985.

EXHIBIT

1-18-85
Mickelson

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In order to provide a nationwide risk assessment it would be necessary to contract with an outside consulting firm or an affiliate such as Exxon Production Research Company. Completion of a nationwide risk assessment would require at least six months.

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c: A. L. Decker
R. R. Eaton
M. E. Gattis